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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
JAN 10 2023
SEAN F. MCAYO, CLERK
DEPUTY

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

1:22-CR-2041-SAB

12 Plaintiff,

SUPERSEDING INDICTMENT

13 v.

Vio: 18 U.S.C. §§ 2119, 2
Carjacking
(Count 1)

14 SUNDRON LARSELL MILLER and
15 PAULA EULOJA CANTU-LOPEZ,

16 Defendants.

18 U.S.C. § 924(c)(1)(A)(i), (ii)
Brandishing a Firearm During
and in Relation to a Crime of
Violence
(Counts 2, 3)

18 U.S.C. §§ 922(g)(1),
924(a)(2)
Felon in Possession of a
Firearm and Ammunition
(Count 4)

18 U.S.C. §§ 1153, 113(a)(1),
Assault with Intent to Commit
Murder
(Count 5)

1 18 U.S.C. §§ 1153, 113(a)(6),
2 2
3 Assault Resulting in Serious
4 Bodily Injury
(Count 6)

5 18 U.S.C. § 924, 28 U.S.C.
6 § 2461(c)
7 Forfeiture Allegations
8

9 The Grand Jury charges:

10 COUNT 1

11 On or about December 28, 2021, in the Eastern District of Washington, the
12 Defendants, SUNDRON LARSELL MILLER and PAULA EULOJIA CANTU-
13 LOPEZ, took a motor vehicle, to wit: a 1997 GMC Sierra, that had been
14 transported, shipped, and received in interstate and foreign commerce from A.S. by
15 force, violence, and intimidation, resulting in serious bodily injury that caused
16 extreme physical pain and protracted and obvious disfigurement and protracted
17 loss and impairment of the function of a bodily member, organ, or mental faculty
18 to A.S., with the intent to cause death and serious bodily harm, all in violation of
19 18 U.S.C. §§ 2119, 2.
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24 COUNT 2

25 On or about December 28, 2021, in the Eastern District of Washington, the
26 Defendant, SUNDRON LARSELL MILLER, during and in relation to a crime of
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1 violence, for which he may be prosecuted in a court of the United States, to wit:
2 Carjacking, in violation of 18 U.S.C. § 2119, as alleged in Count 1 of this
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4 Indictment, did knowingly use, carry, brandish, and possess in furtherance of the
5 Carjacking, a firearm, all in violation of 18 U.S.C. § 924(c)(1)(A)(i), (ii).
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COUNT 3

On or about December 28, 2021, in the Eastern District of Washington, the
Defendant, PAULA EULOJIA CANTU-LOPEZ, during and in relation to a crime
of violence, for which she may be prosecuted in a court of the United States, to
wit: Carjacking, in violation of 18 U.S.C. § 2119, as alleged in Count 1 of this
Indictment, did knowingly use, carry, brandish, and possess in furtherance of the
Carjacking, a firearm, all in violation of 18 U.S.C. § 924(c)(1)(A)(i), (ii).

COUNT 4

On or about December 28, 2021, in the Eastern District of Washington, the
Defendant, SUNDRON LARSELL MILLER, knowing of his status as a person
previously convicted of a crime punishable by a term of imprisonment exceeding
one year, did knowingly possess in and affecting commerce a firearm, to wit: a
Savage Axis .308 rifle, bearing serial number J505953, which firearm had
theretofore been transported in interstate and foreign commerce, in violation of 18
U.S.C. §§ 922(g)(1), 924(a)(2).

COUNT 5

On or about December 28, 2021, within the exterior boundaries of the Yakama Nation, in Indian Country, in the Eastern District of Washington, the Defendant, SUNDRON LARSELL MILLER, an Indian, did intentionally assault Jane Doe, an Indian, with intent to commit murder by striking her with a rifle and pulling the trigger while the rifle was pointed at her, all in violation of 18 U.S.C. §§ 1153, 113(a)(1).

COUNT 6

On or about December 28, 2021, within the exterior boundaries of the Yakama Nation, in Indian Country, in the Eastern District of Washington, the Defendant, PAULA EULOJIA CANTU-LOPEZ, a non-Indian, assaulted Jane Doe, an Indian, and the assault resulted in serious bodily injury in violation of 18 U.S.C. §§ 1152, 113(a)(6), 2.

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 982(a)(5), upon conviction of an offense in violation of 18 U.S.C. § 2119, as set forth in this Indictment, the Defendants, SUNDRON LARSELL MILLER and PAULA EULOJIA CANTU-LOPEZ, shall forfeit to the

1 United States of America, any property, real or personal, which represents
2 proceeds obtained, directly or indirectly, as a result of such violation.
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4 If any forfeitable property, as a result of any act or omission of the Defendants

- 5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property which cannot be divided
10 without difficulty,
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12 the United States of America shall be entitled to forfeiture of substitute property
13 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).
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15 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
16 of an offense in violation of 18 U.S.C. § 2119, and/or 18 U.S.C. §
17 924(c)(1)(A)(i),(ii), and/or 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set forth in this
18 Indictment, the Defendants, SUNDRON LARSELL MILLER (Counts 1, 2 and 4)
19 and PAULA EULOJIA CANTU-LOPEZ (Counts 1 and 3), shall forfeit to the
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1 United States of America, any firearms and ammunition involved or used in the
2 commission of the offense.
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4 DATED this 10 day of January 2023.

5 A TRUE BILL
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10 Vanessa R. Waldref
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13 Michael D. Murphy
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15 Assistant United States Attorney
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